

EXECUTIVE SUMMARY

Based upon the experiences gained through conducting the Integrated Materials Performance Evaluation Program (IMPEP), a working group was tasked to review the IMPEP program for

INTRODUCTION

II. SCOPE AND METHODOLOGY

The Working Group's scope of work was to independently examine the first cycle of IMPEP reviews and experiences to date to make recommendations that could further enhance the IMPEP program. The Working Group held teleconferences on June 8, 2001, and July 10, 2001. Two

Because of the events of September 11, 2001, the completion of the Working Group's report was delayed until 2002.

To complete the tasks as outlined in Section I, the Working Group:

1. Reviewed the "Implementation of the Integrated Materials Performance Evaluation Program and Recission of Final General Statement Policy," published in the w DIs1n
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III. FINDINGS AND RECOMMENDATIONS

The findings and recommendations of the Working Group are discussed in this chapter and organized using the five separate Working Group tasks. Each recommendation is designated as either a substantive change, an enhancement, or an item for future action. The substantive changes recommended by the Working Group are then ranked in the context of the four NRC performance goals.

Task 1 - Evaluation of IMPEP Performance for Additional Enhancements

As noted in the Working Group Charter, one of the strengths of the IMPEP process has been the program's ability to factor in experience, comments, and suggestions to enhance the program. This iterative process has occurred through the biannual IMPEP team member training, development and updating of STP procedures, and the STP project management of the IMPEP program. The Working Group gathered many worthwhile specific comments and enhancements

to other Headquarters licensing and inspection functions. The Working Group noted the success of the NRC SS&D program reviews and agreed with survey responders that expanding the scope of IMPEP would bring balance and equivalency to the program.

Recommendation 1-3 (Substantive Change): The Working Group recommends that consideration be given to expanding the IMPEP process to include all licensing and inspection functions carried out by NRC Headquarters staff (such as SS&D evaluation, general/exempters licens, fuel cycle, etc.).

The Working Group discussed the recommendation that the scope of IMPEP reviews be expanded to include the review of radiation safety programs for Federal and State employees, as

- c. "Legislation and Program Elements Required for Compatibility" should be renamed "Compatibility Requirements."

performance issues have been identified. Although several responders suggested extending the

IMPEP team member training (**Note:** This improvement is included as part of Recommendation 1-1. See Appendix E).

Task 2 - Utilization of Performance Data in NMED and Expansion of Review Criteria to Assess Program Initiatives

The Working Group was tasked to examine how to best utilize the performance data in NMED and

Working Group noted the need for more aggressive between-IMPEP interactions that can better identify and respond to programmatic deficiencies.

The Working Group discussed the use of self-audits as a possible mechanism to supplement the periodic meeting process. As noted in the discussion on Task 2, the Working Group did not support the inclusion of self-audits as a common or non-common indicator in the IMPEP process. However, the Working Group believes that self-audits have value.

The Working Group discussed the proposals that NMSS is developing for between-IMPEP review interactions for Regional reviews, including self-audits. The NRC Regions are developing a self audit program using portions of the IMPEP performance indicators. The existing STP procedure on Periodic Meetings features guidance to discuss the results of any self audits conducted by the State, however the Working Group does not believe that this process is sufficient to truly understand the status of a program. In addition, it was decided that sending the State the latest version of its IMPEP questionnaire and having it update it for each periodic meeting would reduce the State's burden preparing for IMPEP reviews and simplify NRC's task to stay up-to-date with the status of the national materials program.

Reon-cendation 3-1 (Substantive Change): The Working Group reon-cends that significant changes to the periodic meeting process be made to focus the meetings on beon-ing a more effective tool for deter-ining continuing performance in the Agreement States. These changes should include:

- a. The use of self-audits with appropriate flexibility for the size of the program;
- b. In preparation for the periodic meetings, the State should be sent a copy of their

The Working Group reviewed and discussed survey responses and existing procedures on

CONCLUSIONS

TASKS

In examining the IMPEP process, the Working Group should address the following tasks. Each substantive Working Group recommendation should be evaluated and prioritized in the context of the four NRC performance goals¹.

1.

WORKING GROUP ORGANIZATION AND OPERATIONS

Initially the following personnel will be on the Working Group.

NRC Personnel:

Kathleen Schneider, STP, Co-Chair
Charles Cox, NMSS
Lance Rakovan, STP

Agreement State Personnel:

William Silva, TX, Co-Chair
Terry Frazee, WA

Resource Representatives:

James Lynch, Region III
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APPENDIX B - MEMBERS OF THE IMPEP LESSONS LEARNED WORKING GROUP AND NATIONAL MATERIALS PROGRAM STEERING COMMITTEE

Working Group on IMPEP Lessons Learned

Members:

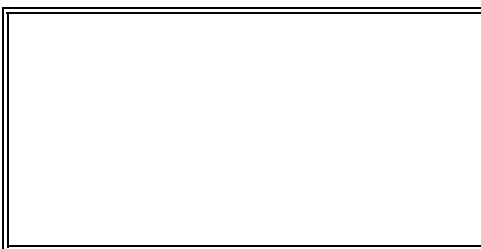
Charles Cox	NRC Office of Nuclear Material Safety and Safeguards
Terry Frazee	Washington Department of Health
Lance Rakovan	NRC Office of State and Tribal Programs
Kathleen Schneider	

APPENDIX C - WORKING GROUP RECOMMENDATIONS BY CATEGORY

SUBSTANTIVE CHANGES:

Recommendation 1-3:

Recommendation 2-1: The Working Group recommends that existing STP Procedures, eonse to Incidents ands, The Working Group recomThe Wells Fargo STP provided training STP Ready, release ofn solid ma



The following recommendations also deal with training:

Recommendation 3-2: The Working Group recommends that STP provide training to the RSAOs and ASPOs on respective duties and responsibilities, including uniformity of periodic meetties, RSAO/ASPO interactions and communication between IMPEP reviews.

Recommendation 5-3: The Working Group recommends that STP develop IMPEP orientation/training for potential Agreement State Liaisons and that NRC periodically present this information at annual OAS meetties.

APPENDIX F - SUMMARY OF SPECIFIC RECOMMENDATIONS INVOLVING IMPEP GUIDANCE

The following recommendations are included as part of **Recommendation 1-2**:

Recommendations discussed in the body of the report:

APPENDIX G - SUMMARY OF SURVEY RESPONSES FROM AGREEMENT STATES AND NRC

STAKEHOLDERS SAMPLED

In an attempt to get a sampling of replies from different stakeholders, the IMPEP survey was sent to three different groups:

(1) 4e IMPEP su15>BDC /T13>BDC -02 TcRegional Offices036d fere2 TcSS&Dpprogram);three different group

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Management Plan (SDMP). Should any of these indicators be altered or deleted?
Are there any other indicators that should be added?

6. appropriate?
7. Are IMPEP review team communications to State/Regional management adequate during reviews and at the appropriate management level?
8. IMPEP teams typically have one Agreement State member. Is this adequate

2. Did anything impede your effectiveness as an IMPEP team member? If so, how 2.

_____	_____
_____	_____
_____	_____

14. The periodic meeting process as currently implemented is not fully effective in identifying negative performance trends before the conduct of an IMPEP review.
15. The periodic meetings procedure should be reviewed to identify a more effective mechanism of evaluating the performance of the state.
- 16.

2. How could the pre-review process, including the IMPEP questionnaire, be improved?

Trends:

NRC	STATE
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<u>1</u>	<u>4</u>	Questionnaire should be shorter
<u>6</u>	<u>5</u>	Questionnaire is fine
<u>0</u>	<u>0</u>	Questionnaire should be longer
_____	_____	

16. The data needed to evaluate the Status of the Inspection Program indicator should be provided via the questionnaire, then verified by the team while on-site.

Agreement State

1. The questionnaire should use the RATS system to supply the appropriate information rather than requesting the State to duplicate.
- 2.

3.

4. **IMPEP uses five “common” performance indicators: Status of Materials Inspection Program; Technical Quality of Inspections; Technical Staffing and Training; Technical Quality of Licensing Actions; and Response to Incidents and Allegations. Should any of these indicators be altered or deleted? Are there any other indicators that should be added?**

NRC STATE

<u>12</u>	<u>18</u>	No change necessary
<u>9</u>	<u>5</u>	Suggested revisions
<u>4</u>	<u>7</u>	Indeterminate answer or no response

Suggestions and Opportunities for Improvement:

NRC

1. Technical Staffing and Training should be deleted in light of a performance based inspection philosophy.
2. A chronic problem in the States is funding for staff, i.e., salaries. If the team evaluated the budget, some impetus may be given the State to improve the salaries of staff.
3. The Status of Materials Inspection indicator should be deleted and the important aspects combined into the Technical Quality of inspection indicator.
4. SS&D and decommissioning should be considered common indicators since some or all of
- 3.

5. **IMPEP uses six “non-common” performance indicators: Legislation and Program Elements Required for Compatibility; Sealed Source and Device Evaluation Program; Low-Level Radioactive Waste Disposal Program; Uranium Recovery Program; Regional Fuel Cycle Inspection Program; and Site Decommissioning Management Plan (SDMP). Should any of these indicators be altered or deleted? Are there any other indicators that should be added?**

NRC STATE

<u>14</u>	<u>13</u>	No change necessary
<u>6</u>	<u>8</u>	Suggested revisions
<u>5</u>	<u>9</u>	Indeterminate answer or no response

Suggestions and Opportunities for Improvement:

NRC

1. Perhaps there should be consideration to adding the HQ fuel cycle program.
2. The only interesting area to probe would be the interaction of the AEA program with the remainder, e.g., x-ray and emergency response.
3. SS&D and decommissioning should be common indicators.
4. Rename the SDMP indicator as decommissioning.
5. The Regional Fuel Cycle Inspection Program indicator should be part of the Uranium Recovery indicator.
6. I1 Tf (really a need to separate out the uranium recovery, LLRW and decommissioning)Tj -0.0025 Tc 0.00

Agreement State

1. It might be of more value for the states with the LLRW (and Uranium recovery) facilities to

5. Flexible criteria and clear guidance needs to be provided for the SS&D Program evaluation. Reviews are not always handled in a performance based manner.
- 6.

6. **Are the performance indicators used in a performance-based manner, when appropriate?**

NRC STATE

14
4
7

17
6
7

Yes

No

Indeterminate answer or no response

Suggestions and Opportunities for Improvement:

NRC

1.

7. Are IMPEP review team communications to State/Regional management adequate during reviews and at the appropriate management level?

NRC STATE

<u>21</u>	<u>20</u>	Yes
<u>1</u>	<u>3</u>	No
<u>3</u>	<u>7</u>	Indeterminate answer or no response

Suggestions and Opportunities for Improvement:

NRC

1. There tends to be a bit too much concern to not find fault with State's program.
 2. The only problems occur with late findings and/or management delegation.
 3. There often seems to be a disconnect between what program management heard during the exit, and what is documented in the report or brought to the MRB.
 4. And what is not mentioned should be addressed
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14.

10.

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12. **Is the current IMPEP timeline, including the amount of time allotted for State/Region feedback on the draft report and issuance of the final IMPEP report within 104 days of the on-site review, adequate? P**

NRC STATE

<u>19</u>	<u>20 P</u>
_____	_____
_____	_____

13. Are Periodic Meetings valuable? If not, what other method could be used to evaluate programs between IMPEP reviews? How do you propose we pay the

6. Mid-way meetings should focus on evaluating weaknesses from the last inspection and the overall effectiveness of the program on a larger scale.
7. Not in their present form. Not much comes of sitting around a table and talking. More

ADDITIONAL QUESTIONS FOR IMPEP TEAM MEMBERS

1.

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_____	_____

2.

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